

REMARKS

At the onset, Applicant wishes to thank the Examiner for the courtesy extended to Applicant's attorney representative in a series of e-mail and phone communications beginning on June 28, 2005 and ending on August 1, 2005. The discussions from June 28 to August 1 culminated in the set of claim amendments filed herewith. In email messages of August 1, the Examiner indicated that independent claims 1, 10, and 13 as amended should be allowable.

Claims 1-11, 13, and 14 as amended are pending in the application. Claims 1 and 10 have been amended to more particularly point out and claim the invention. Support for the amendments of claims 1 and 10 is found at least in the drawings, see for example Fig. 2. Claim 12 has been cancelled. Claim 13 has been amended into independent form, incorporating the subject matter of cancelled claim 12. Claim 14 has been amended to depend from claim 13 rather than from cancelled claim 12. No new matter has been added by the foregoing amendments.

Claim Rejections – 35 U.S.C. § 103 – Claims 1-8 and 10-12

The Examiner has rejected claims 1-8 and 10-12 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,412,987 (Horwitz *et al.*, hereinafter "Horwitz"). The Examiner contends that it would be obvious to make the fasteners a permanent part of the aperture plate and to size the hole/opening 84 to snugly receive a fiber connector. In view of the foregoing amendments, Applicant respectfully traverses the rejections of claims 1-8, 10, and 11. In view of cancellation of claim 12, rejection of claim 12 is now moot.

Horwitz discloses an adapter system usable in conjunction with a fiberoptic termination inspection microscope 30 to inspect fiberoptic cables and connectors. The purpose of the microscope 30 is to inspect a cable end 104 to determine if the cable end 104 is sufficiently clean and polished to ensure proper performance of the fiberoptic cable. The microscope 30 is housed within a housing 32 that is connected to a female adapter 44. The female adapter 44 includes a base plate 46 which is fixedly mounted by screws 48 to the housing 32. The base plate 46 has a groove 58 (best seen in Fig. 1) that slidably receives a plate 108. The plate 108 includes an

opening for receiving a member 110. The member 110 is fixed to the plate 108 by a pair of fasteners 114. The member 110 includes an aperture 112. Referring to Figs. 5-7, a fiber optic ribbon connector 101 having an end 104 is secured to a ribbon connector mount 109 which is further secured to the member 110 via screws and threaded holes 126, 128. The member 110 is then secured to the remaining structure via the fasteners 114.

Claim 1 has been amended to recite, in pertinent part:

...
a base plate mountable along a first surface of the base plate to a mounting surface of the microscope and having an opening extending through the base plate and sized to complementarily receive the optical fiber connector and to guide the optical fiber connector into an operative position relative to the microscope;
an aperture plate connected to the first surface of the base plate, the aperture plate having an aperture overlapping the base plate opening;

Claim 10, as amended, nearly identically recites, in pertinent part:

...
a base plate mountable along a first surface of the base plate to a mounting surface of the microscope and having an opening extending through the base plate and sized to receive the optical fiber connector and to guide the optical fiber connector into an operative position relative to the microscope;
an aperture plate mounted to the first surface of the base plate, the aperture plate having an aperture overlapping the base plate opening;

Even if Horwitz were modified as suggested by the Examiner, Horwitz would still fail to disclose the recited feature of a base plate mounted along a first surface of the base plate to a mounting surface of a microscope, and an aperture plate mounted to that first surface of the base plate. Horwitz further fails to disclose at least the recited feature of an opening extending through the base plate, sized to receive an optical fiber connector so as to guide the optical fiber connector into an operative position relative to the microscope. As the modified Horwitz device fails to disclose, teach, or suggest each and every element of claims 1 and 10, and therefore also of claims 2-8 depending from claim 1 and of claim 11 depending from claim 10, it is respectfully

submitted that a *prima facie* case for obviousness has not been established with respect to these claims. Accordingly, it is requested that the rejection of claims 1-8, 10, and 11 under 35 U.S.C. § 103(a) be withdrawn.

Claim Rejection – 35 U.S.C. § 103 – Claim 9

The Examiner has rejected claim 9 under 35 U.S.C. § 103(a) as being unpatentable over Horwitz in view of U.S. Patent Application Publication No. 2004/0045509 (Or *et al.*, hereinafter “Or”). In view of the foregoing amendments, Applicant respectfully traverses this rejection.

Or discloses a reduced friction lift pin for use in semiconductor manufacturing equipment. The lift pin moves vertically within a guide hole formed in a substrate support. The lift pin includes at least one shoulder having a diameter sized to match the inner bore of the guide hole. A remainder of the lift pin has a diameter less than the shoulder diameter. Thus, only the shoulder portion of the lift pin slidingly engages the inner bore of the guide hole, thereby reducing wear of the pin. The lift pin may be provided with a planar tip to reduce tilting of the lift pin as it is moved within the guide hole.

As discussed above, Horwitz fails to disclose at least the features recited in claim 1 of a base plate mounted along a first surface of the base plate to a mounting surface of a microscope, and an aperture plate mounted to that first surface of the base plate as well as the feature of an opening extending through the base plate, sized to receive an optical fiber connector so as to guide the optical fiber connector into an operative position relative to the microscope. Assuming *arguendo* that Horwitz and Or are properly combinable under 35 U.S.C. § 103(a), then even if Horwitz were modified to include the reduced friction lift pins of Or, the proposed combination would still fail to disclose, teach, or suggest all of the features of claim 1, and of claim 9 depending from claim 1. Accordingly, it is respectfully requested that the rejection of claim 9 under 35 U.S.C. § 103(a) be withdrawn.

Allowable Subject Matter

Applicant acknowledges with appreciation that the Examiner has found claims 13 and 14 to be allowable if rewritten in independent form. In accordance with the Examiner's comments, claim 12 has been cancelled, claim 13 has been amended into independent form incorporating the subject matter of cancelled claim 12, and claim 14 has been amended to depend from claim 13.

CONCLUSION

In view of the foregoing amendment and remarks, Applicant respectfully submits that the present application, including claims 1-11, 13, and 14 is in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

ERIC NORLAND

August 24, 2005 By: Martin G. Belisario
(Date) **MARTIN G. BELISARIO**
Registration No. 32,886
AKIN GUMP STRAUSS HAUER & FELD LLP
One Commerce Square
2005 Market Street, Suite 2200
Philadelphia, PA 19103-7013
Telephone: 215-965-1200
Direct Dial: 215-965-1303
Facsimile: 215-965-1210
E-Mail: mbelisario@akingump.com

MGB/KBG